



U.S. Department of Justice

United States Attorney  
Southern District of New York

**MEMORANDUM ENDORSED**

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

August 28, 2019

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The Honorable Gregory H. Woods  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York, 10007

**Re: United States v. Edward Shin, No. 19 Cr. 552 (GHW)**

Dear Judge Woods:

The Government writes respectfully to request that the Court enter the enclosed protective order to govern the production of discovery in this matter. The Government and counsel for the defendant have executed the protective order.

In addition, the Government also wishes to advise the Court that we anticipate producing between 500 gigabytes and 1 terabyte of discovery in this matter. To that end, prior to the initial conference on August 14, we requested that the defense provide a 1 terabyte hard drive, which the defense has done. However, at the August 14 conference, Government counsel inadvertently misstated the volume of discovery to be approximately 10 gigabytes. The Government apologizes for the erroneous statement.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

Application granted by separate order.  
The Clerk of Court is directed to  
terminate the motion pending at Dkt.  
No. 13.

SO ORDERED  
New York, NY  
August 28, 2019

  
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GREGORY H. WOODS  
United States District Judge

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